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January 30, 2025

**Via ECF**

Hon. Edgardo Ramos  
United States District Court for the Southern  
District of New York  
40 Foley Square  
New York, New York 10007

**Re: *Smith et al. vs. Giuliani*, 1:24-mc-00351-ER (S.D.N.Y.)**

Dear Judge Ramos,

We write on behalf of Movants in the above-captioned matter to enforce a non-party subpoena duces tecum (“the Subpoena”) to Respondent Rudolph Giuliani, to provide updates on the underlying matter, *Smith v. Trump*, 1:21-cv-02265-APM (D.D.C.). Given that Mr. Giuliani has failed to appear in this matter in any capacity, movants still view the motion before this court as “unopposed, fully briefed, and ripe for decision.” *See* ECF No. 18 (Movants’ letter submitted as a reply brief on October 8, 2024); Order, ECF No. 19 (entered Oct. 9, 2024).

Movants recently obtained an extension to continue to move forward in fact discovery in *Smith*, which is now set to conclude on July 28, 2025. Thus, movants are completing document collection from defendants and third-parties. Movants have also begun to notice depositions for this spring.

Movants will be appearing before Your Honor on February 6, 2025 in a related pending enforcement action, *In re Subpoena to Daniel J. Scavino Jr.*, No 7:24-mc-566-ER, and respectfully request time at that conference to discuss any outstanding issues related to their motion to compel documents from Mr. Giuliani. Alternatively, Movants are available to appear at a separate conference solely focused on this matter.

Respectfully submitted,

The Hon. Edgardo Ramos  
January 30, 2025

A handwritten signature in blue ink, appearing to be 'J. Margolin', with a small dot at the end.

Joshua S. Margolin  
Partner